



January 5, 2022

Via ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted. Mr. Roque's
voluntary surrender date is
extended until February 10, 2022

SO ORDERED.

U.S. v. Michael Roque, 18-Cr-640 (RA)
Consent Request to Extend Surrender Date
Ronnie Abrams, U.S.D.J.
January 5, 2022

Honorable Judge Abrams:

I write on behalf of Mr. Roque and with the consent of the SDNY U.S. Pretrial Services Office ("USPTSO") and the government to request a 30-day extension of Mr. Roque's surrender date for his seven-month sentence, currently set for January 10, 2022. The reason for this request is that we have been informed by Pretrial Services that the Department of Probation has not yet set a designation for Mr. Roque's sentence, and that it is unlikely that a designation will be set by January 10, 2022. We are also aware that, consistent with the rise in Omicron Covid variant infections in New York, there has also been a spike in Covid infections at MDC as well as at the Essex County Correctional facilities, which are two facilities where Mr. Roque would likely be held until his designation. In light of this, and our concern for Mr. Roque's health, we are requesting that his surrender date be extended 30 days, or to February 10, 2022, in the hopes that the Covid infection spike in these facilities (and everywhere) will have mitigated by then and that a designation will be set for Mr. Roque's sentence by that date. Neither the USPTSO nor the government has any objection to this request.

We thank the Court in advance for its consideration of this matter and wish everyone good health.

Respectfully,

Judith Vargas

Judith Vargas, Esq.
Attorney for Michael Roque

cc: AUSAs Brett Kalikow/Michael Neff, via email and ECF
USPTSO Ashley Cosme, via email and ECF